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500002478

RCRA COMPLIANCE AND ENFORCEMENT BRANCH  
ENFORCEMENT CASE RECOMMENDATION  
WORKSHEET<sup>1</sup>

EPA ID NUMBER: PA0000193409

FACILITY NAME: Penn United Technologies, Inc.

CASE REVIEW OFFICER: Rebecca Serfass

REVIEW START DATE:

8-27-14 (P.B.)

## FINDINGS OF INITIAL CASE REVIEW:

Sent NOV to Penn United on 5/13/16 with the following violations:

1. Failed to mark HW containers with start accumulation dates
2. Failed to conduct weekly inspections of HWAA
3. Failed to contain waste lamps in closed containers
4. Failed to label waste lamp containers
5. Failed to submit 8700-12 notification to state on Facility's management of Hazardous Secondary Materials (HSM) (New Def. of Solid Waste)
6. Failed to notify stated of precious metal exemption

## AoCs

1. Waste lamps may be stored for up to one year
2. Satellite accumulation may not exceed 55-gallons at any one SAA

DISPOSITION RECOMMENDATION: JUD REF APO AO NOV 3013 7003 CLOSE OTHER:

## JUSTIFICATION FOR RECOMMENDATION:

Facility initially provided NOV Response on 6/9/16 to demonstrate that they have taken measures to correct violations 1-4 and to clarify that they were not operating under the precious metal exemption (violation #6). They in fact were not, since precious metal material was being managed as HW and sent out within 90 days, while other reclaimed material was not.

On 6/24/16 Facility provided a copy of the 8700-12 subsequent notification they submitted to the state to notify them of the Facility's HSM management for their reclaimed material.

On 8/9/16 and 8/24/16 Facility provided documentation to demonstrate that the Facility is managing an HSM that is being legitimately reclaimed or recycled and that the Facility has made a reasonable effort to ensure the reclamation facility is truly reclaiming or recycling the materials in question.

## CONCURRENCE SECTION

CASE REVIEW OFFICER

DATE:

8.24.16

ASSOCIATE DIRECTOR  
LAND AND CHEMICALS DIVISION

DATE:

8/25/16

<sup>1</sup> This is a pre-decisional document protected by the deliberative process and attorney work product privileges (and may also be privileged attorney-client communication). Conclusions or recommendations are intended solely as primary information for government personnel. This worksheet contains tentative conclusions and staff-level recommendations and does not create any rights, or procedural, or defenses, as they are not binding on the Agency or the Department of Justice.



# Penn United - Filter Press Cake FOO6

\*received approval for treatment on 11/30/11

2012

January	February	March	April
		• 3/13/12 - 4529 P	
May	June	July	August
		• 7/11/12 - 10Y (31)	
September	October	November	December
		• 11/1/12 - 18Y (24)	

# of days over 90

SAA container = 1 cubic yard cardboard box  
35 days in SAA

1 yd<sup>3</sup> = ~173 G (dry)  
 $\frac{173 \text{ G}}{35 \text{ days}} = 11 \text{ days to generate 55 G}$

Penn United - Filter Press Cake  
FOO6

2013

January	February	March • 3/12/13 - 12Y (42)	April
May	June • 6/12/13 - 17Y	July	August
September • 9/13/13 - 11Y (4)	October	November	December • 12/2/13 - 20,186P



Penn United - Filter Press Cake  
Foole

2014			
January	February • 2/24/14 - 13,126P	March	April
May	June	July	August • 8/11/14 - 10Y (79)
September • 9/17/14 - 6Y	October	November • 11/3/14 - 7Y	December



Penn United - Filter Press Cake  
FO06 NA3D77

2015			
January	February • 2/5/15 - 13Y (5)	March	April • 4/15/15 - 8Y
May	June • 6/9/15 - 9Y	July	August • 8/7/15 - 9Y
September	October • 10/27/15 - 13Y	November	December

\* SAA container = 1 cubic yard cardboard box  
 35 days in SAA       $1 \text{ yd}^3 = \sim 173 \text{ G (dry)}$   
 $\frac{173 \text{ G}}{25 \text{ days}} = 11 \text{ days to generate 55 G.}$



# PennUnited - Tin/Lead Filter Cartridges

FOO6  
BOO8

NA3007

2011

January	February	March	April
		• 03/22/11 - 1637P	
May	June	July	August
	• 6/23/11 - 1Y (4)		
September	October	November	December
		• 11/15/11 - 1187P (56)	

\* SAA container = 1 cubic yard cardboard box  
52 days in SAA

$$14d^3 = \sim 173G \text{ (dry)}$$

$$\frac{173G}{52 \text{ days}} = 16 \text{ days to generate } 55G.$$



Penn United - Tin / Lead Filter Cartridges  
 E006 NA3077  
 D008

2012

January	February	March	April
		• 3/6/12 - 1Y (23)	
May	June	July	August
• 5/15/12 - 1Y	• 6/27/12 - 1 box Sn Filter present * inspection log*		• 8/1/12 - 2 boxes Sn Filters * inspection log*
September	October	November	December
9/5/12 • 3 boxes Sn filters * inspection logs* • 2 boxes Sn filters 9/18/12 * inspection log*	• 10/1/12 - 1Y (50) * none* as of 10/2/12	• 11/27/12 - 2 boxes filters * inspection log*	• 12/4/12 → nothing * insp. log* • 12/11/12 1 box * insp. log* • 12/19/12 * insp. log* 2 boxes



PennUnited - Tin/Lead Filter Cartridges  
FO06 NA3077  
DO08

2013

January	February	March	April
	<ul style="list-style-type: none"> <li>2/26/13 * insp log*</li> <li>3 boxes (Sn/Ni)</li> </ul>	<ul style="list-style-type: none"> <li>3/12/13 * insp log*</li> <li>4 boxes (Sn/Ni)</li> </ul>	<ul style="list-style-type: none"> <li>4/10/13 - 3Y (100)</li> </ul>
May	June	July	August
		<ul style="list-style-type: none"> <li>7/15/13 - 1000P (7)</li> <li>7/2/13 - 2 boxes * insp log*</li> <li>Sn/Ni</li> <li>* gone *</li> </ul>	
September	October	November	December
<ul style="list-style-type: none"> <li>9/19/13 - 1Y</li> <li>9/6/13 appear on insp. log</li> </ul>		<ul style="list-style-type: none"> <li>11/08/13 - 1500P</li> <li>11/5/13 1 box * insp log*</li> <li>filter</li> </ul>	



Penn United

Tin/Lead Filter Cartridges

FOOL  
DOOS

NA3077

2014

January	February	march	April
• 01/22/14 - 1Y  • 1/5/14 - 1 box re shop floor 1 box basement			• 04/16/14 - 1Y
may	June	July	August
	• 6/27/14 - 1 box Sn *insp. log*	• 07/09/14 - 1Y	
September	October	November	December
• 9/24/14 - 1 box Sn *insp. log*	• 10/20/14 - 1Y (14)	11/13/14 1 Sn box *in use* *insp. log*	



# Penn United - Tin/Lead Filter Cartridges

FOOL  
DOOR

NA3077

2015

January	February	March	April
<p>01/14/15 - 1Y</p> <p>1/13/15 - 1 box *not in use Sn anymore* *insp. log*</p> <p>1/19/15 1 box in use *insp log*</p>	<p>2/3/15 1 box Sn *insp. log*</p> <p>2/20/15 1 box on deck *insp. log*</p> <p>* 2/27/15 1 box in use *insp log*</p>	<p>03/27/15 - 1Y</p> <p>not in use - *insp. log*</p>	
May	June	July	August
<p>5/5/15 - 1 box in use *insp. log*</p>	<p>6/15/15 - not in use *insp. log*</p>	<p>7/1/15 *in use* *insp. log*</p>	<p>08/13/15 - 2Y (50)</p> <p>8/28/15 *still in use*</p>
September	October	November	December



Penn United - Nickel Filter Cartridges  
Foot

2011

January	February	March	April
		• 03/22/11 - 1632 P	
May	June	July	August
	• 6/23/11 - 1Y (4)		
September	October	November	December
		• 11/15/11 - 2164 P (56)	



# Penn United - Nickel Filter Cartridges FOOL

2012

January	February	March 3/16/12 - 1Y	April
May 5/15/12 - 1Y	June	July	August
September	October 10/1/12 - 3Y (50)	November	December

# days over 90

\* SAA container = 1 cubic yard cardboard box  
52 days in SAA

1 yd<sup>3</sup> = ~173 G (dry)  
 $\frac{173 \text{ G}}{52 \text{ drums}} = 16 \text{ days to generate 55 G.}$



Penn United - Nickel Filter Cartridges  
FOOLo

2013

January	February	March	April • 4/10/13 - 3Y
May	June	July • 7/15/13 - 1000P	August
September • 9/19/13 - 1Y	October	November • 11/08/13 - 1500P	December

# Penn United - Nickel Filter Cartridges FOOL

2014

January - 01/22/14 - 1Y	February	March	April - 04/16/14 - 1Y
May	June	July - 07/09/14 - 1Y	August
September	October - 10/20/14 - 1Y	November	December



PennUnited - Nickel Filter Cartridges  
FC06

~~2012~~ 2015

January · 01/14/15 - 1Y	February	March · 3/27/15 - 1Y	April
May	June	July	August · 08/13/15 - 2Y
September	October	November	December




# Spent Plating Rinse 2012

DOO2, DOO8 Waste Corrosive Liquid

- 1) 1/30/12 - 4,809 G UN3264
- 2) 10/16/12 - 4700 G UN3264

2014 7/15/13 - 4835 P? UN1760?

- 3) 01/13/14 - 4720 G UN3264

TQ  
LT2

Penn United

ask state about this.

plating rinse solution

treated in a permitted treatment system (HW permit by rule) approved by PA DEP on 11/30/2011  
 Denise Campbell as long as meeting requirements won't need permit.

All shipments shown in manifests provided.  
 (814-332-6967)

## Evaporator Slurry Residue

FOOL only, liquid

NA3082

tanks  
no SAA  
SI+S2

- 1) 3/16/12 - 2850 G
- 2) 5/15/12 - 1465 G
- 3) 7/2/12 - 2,000 G
- 4) 8/20/12 - 2010 G
- 5) 9/27/12 - 2,067 G
- 6) 10/31/12 - 1970 G
- 7) 12/07/12 - 1950 G
- 8) 01/23/13 - 3540 G
- 9) 03/01/13 - 2500 G
- 10) 05/14/13 - 2700 G
- 11) 06/14/13 - 1900 G
- 12) 07/18/13 - 2050 G
- 13) 8/28/13 - 1900 G
- 14) 10/03/13 - 2150 G

- 14) 11/08/13 - 2100 G
- 15) 12/24/13 - 2000 G
- 16) 2/11/14 - 2829 G
- 17) 03/27/14 - 2400 G
- 18) 05/05/14 - 2067 G
- 19) 06/19/14 - 2200 G
- 20) 07/17/14 - 2405 G
- 21) 08/22/14 - 2176 G
- 22) 09/22/14 - 2175 G
- 10/29 06/10
- 11/26 07/22
- 12/31 08/19
- 02/05/15 09/14
- 03/11 10/15
- 04/15
- 05/18

TQ  
LT2

## Plating Rinse

FOOL only, Solid

cartridge filters

NA3077

- 1) 3/16/12 - 1Y
- 2) 5/15/12 - 1Y
- 3) 7/11/12 - 1Y
- 4) 10/11/12 - 3Y 50 days
- 5) 4/10/13 - 3Y 100 days
- 6) 7/15/13 - 1000 P 7 days
- 7) 9/19/13 - 1Y
- 8) 11/08/13 - 1500 P
- 9) 01/22/14 - 1Y
- 10) 04/16/14 - 1Y
- 11) 07/09/14 - 1Y
- 12) 10/20/14 - 1Y 14 days
- 13) 01/14/15 - 1Y
- 14) 03/27/15 - 1Y
- 15) 08/13/15 - 2Y 50 days
- Nothing as of 10/27/15

cartridge filters used to remove Solids from associated baths

Total: 23 x 2 = 446 days

Month/Year:

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday



NA3077

Fool w/ no designation (manifest) Filter Press Cake Perm  
amount over 90 days ~~from Scrap Slurry~~ United  
Plating Rinse Sol'n

- 3/13/12 - 4529 P
- 7/11/12 - 10Y 31 days
- 11/1/12 - 18Y 24 days
- 3/12/13 - 12Y 42 days
- 6/12/13 - 17Y
- 9/13/13 - 11Y 4 days

12/2/13 - 20,186 P

2/24/14 - 13,126 P

- 8/11/14 - 10Y 79 days

9/17/14 - 6Y

11/3/14 - 7Y

- 2/5/15 - 13Y 5 days

4/15/15 - 8Y

6/9/15 - 9Y

8/7/15 - 9Y

10/27/15 - 13Y

from tanks T2 + LT2  
treated to adjust pH and remove  
metals → yields filter cake from  
filter press.

→ SAA utilized?

"filter press sludge"

Total: 185 days

+ 446 = 631 days

Tin Lead + Nickel

between 3 waste streams

Month/Year:

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday



~~Spent plating rinse solution~~  
~~D002, D008~~ Tank T2  
~~liquid~~ treated permit by rule

**DONE**

on previous  
page

F006 sold "Evaporator solids"

associated w/  
evaporator  
sludge, only  
every 80 after  
on manifests

5/15/12 - 2500 P

4/10/13 - 2161 P

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D002, D007

8.20.10 - 90 lbs

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Plating rinse Sludges UN1760

7/15/13 - 483 SP

Spent black oxide waste  
D005 liquid NA3082

10/22/12 - 300 G

8/6/13 - 200 G

3/21/14 - 2600 P

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Selenium D001, D010

01/03/14 - 150 P

---

F006, D008

5/9/13 - 156 G  
53 G  
26 G

---

D008

3.23.15 - 1500 P

Month/Year:

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

cc: Martha Michalek

Joel  
Amia  
Bray  
Richard M.

NOTIFICATION OF HAZARDOUS WASTE PERMIT-BY-RULE ACTIVITY

I. Installation's EPA I.D. Number PA0000 193409

II. Name of Installation Penn United Technologies, Inc. OCT 26 2011

III. Location of Installation  
Cabot Butler  
Municipality (Township, Borough, City) County

IV. North American Industry Classification System (NAICS) Codes for the installation (six-digit number in order of priority)

1. 333514 Specify: Special die and tool 2. 332116 Specify: Metal Stamping

3. 332813 Specify: Electroplating, Plating, Polishing, N/A Specify: N/A  
Anodizing, and Coloring

V. Type of Hazardous Waste Permit-by-Rule Activity (attach supporting narrative description)

- ☐ 1. Elementary neutralization unit - see definition of this term at 40 CFR §260.10 and applicable permit-by-rule requirements at 25 Pa. Code §270a.60(b)(1).
- ☒ 2. Wastewater treatment unit - see definition of this term at 40 CFR §260.10 and applicable permit-by-rule requirements at 25 Pa. Code §270a.60(b)(1)
- ☐ 3. Generator treatment in accumulation containers, tanks or containment buildings - see permit-by-rule requirements at 25 Pa. Code §270a.60(b)(2). NOTE: An individual permit will be required for a treatment activity that is regulated by standards in addition to those applicable to generator accumulation units (e.g., thermal treatment).
- ☐ 4. Treatment of spent, lead-acid batteries at a battery manufacturing facility prior to their reclamation - see permit-by-rule requirements at 25 Pa. Code §270a.60(b)(3).
- ☐ 5. Treatment of hazardous waste onsite, at the site where it is generated, prior to reclamation of the hazardous waste at that site - see permit-by-rule requirements at 25 Pa. Code §270a.60(b)(4).
- ☐ 6. Treatment of recyclable materials (hazardous wastes that are recycled) to make the materials suitable for onsite or offsite reclamation of economically significant amounts of any precious metal identified in 40 CFR Part 266, Subpart F - see permit-by-rule requirements at 25 Pa. Code §270a.60(b)(5).

VI. Existing Environmental Permits

A. NPDES (Discharges to Surface Water)

N/A

B. UIC (Underground Injection of Fluids)

N/A

C. RCRA (Hazardous Waste)

PAR000028258 / PA 0000 193409

G. Other Permits

FRS 110000817377 (Specify)

EP313 16023 PNNNT799NP

Air Permit 10.00333

D. PSD (Air Emissions from Proposed Sources)

N/A

E. Municipal Waste (As defined in Act 97)

N/A

F. Residual Waste

N/A

CLIENT 24924

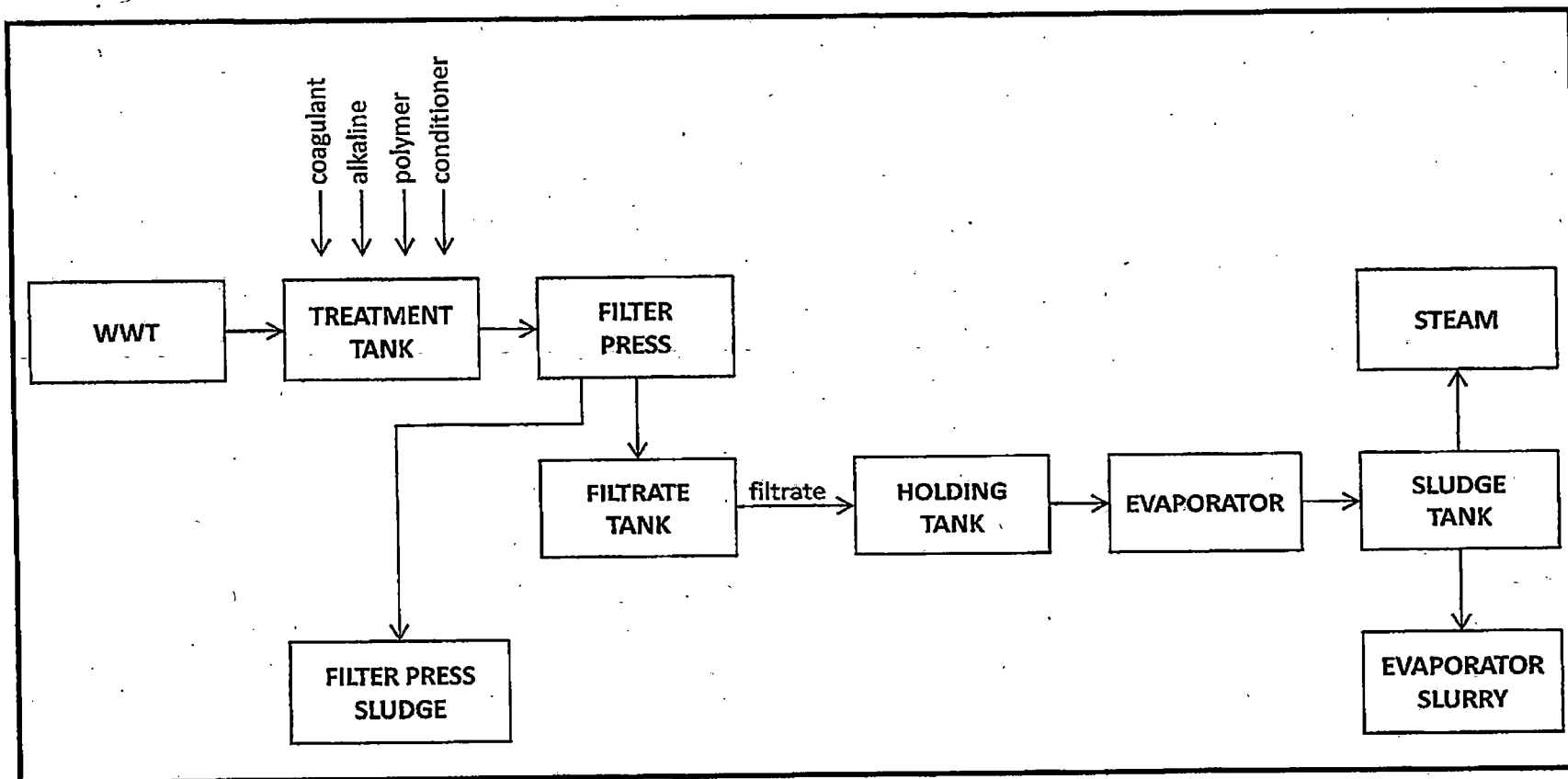
SITE 270985

APS 762429

AUTH 898710

OCT 17 2011

Source: Advanced Chemical Systems Process Flow Diagram



Prepared by/Date: PTB / 10-11-2011  
Checked by/Date: RBG 10-110-2011

Penn United Technologies  
795 North Pike Road  
Cabot, Pennsylvania



Bradburne, Briller & Johnson, LLC  
www.bbgroup.com

Process Flow Diagram

Project No. R1106058





Penn United / Cabot, PA  
Project No. R1106058

October 4, 2011

Joel Fair  
Pennsylvania Department of Environmental Protection  
Northwest Office  
230 Chestnut Street  
Meadville, PA

Re: Notification of Hazardous Waste Permit-By-Rule Activity  
Penn United Tech Inc,  
Cabot, PA  
BB&J Project No. R1106058

Dear Mr. Fair:

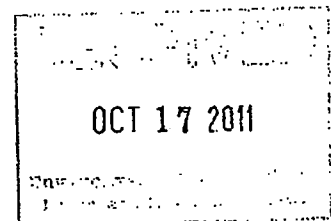
Per our previous conversation, please find the attached completed Notification of Hazardous Waste Permit-By-Rule Activity form. I have also included a process flow diagram for your review.

If you have any questions concerning this Letter of Recommendations, please contact Mr. Richard Garlitz of BB&J at 412-882-4050.

Sincerely,

BRADBURN, BRILLER & JOHNSON, LLC

Richard Garlitz, P.E.  
Senior Engineer



## Subchapter F. SPECIAL FORMS OF PERMITS

Sec.

270a.60. Permits-by-rule.

270a.62. Hazardous waste incinerator permits.

270a.64. Interim permits for UIC wells.

270a.66. Permits for boilers and industrial furnaces burning hazardous waste.

### § 270a.60. Permits-by-rule.

(a) Relative to the requirements incorporated by reference, the following are substituted for the introductory paragraph in 40 CFR 270.60 (relating to permits by rule):

(1) In addition to other provisions of this chapter, the activities listed in this section are deemed to have a hazardous waste management permit if the owner or operator gives prior notification to the Department on a form provided by the Department and the conditions listed are met.

(b) In addition to the requirements incorporated by reference, the following requirements apply:

(1) The owner or operator of an elementary neutralization unit or a wastewater treatment unit is deemed to have a permit-by-rule, if the owner or operator complies with the following requirements:

(i) The facility treats hazardous waste generated onsite.

(ii) The facility has an NPDES permit, if required, and complies with the conditions of that permit.

(iii) Section 264a.11 (relating to identification number and transporter license) and 40 CFR 264.11 (relating to identification number).

(iv) Chapter 264a, Subchapter D and 40 CFR Part 264 Subparts C and D (relating to preparedness and prevention; and contingency plan and emergency procedures).

(v) 40 CFR Part 265, Subpart Q (relating to chemical, physical and biological treatment), except for 40 CFR 265.400 (relating to applicability).

(vi) For the purposes of this subsection, the owner or operator of an elementary neutralization unit or wastewater treatment unit permit-by-rule facility may treat wastes generated at other

265.17(b) - does not generate extreme heat or pressure / violent rxn  
 ① produce toxic mists, fumes, dusts, gases  
 ② produce uncontrollable flammable fumes or gases  
 ③ training & job experience damage structural integrity of device  
 ④ harm human / env. health in other ways.



facilities operated or owned by the same generator, if the generator provides prior written notice to the Department and the wastes are shipped under a manifest in compliance with § 262a.20 and 40 CFR 262.20 (relating to general requirements; and general requirements).

(vii) The Department may, under special circumstances, approve on a case-by-case basis the receipt and treatment of wastes generated offsite by a different generator for treatment at a facility regulated under this subsection without the treatment of the wastes resulting in the loss of permit-by-rule status under this subsection.

(2) A generator that treats its own hazardous waste in containers, tanks or containment buildings is deemed to have a permit-by-rule, if the owner or operator complies with the following requirements:

(i) The facility is a captive facility and the only waste treated is generated onsite.

(ii) The notification requirements of 40 CFR 264.11 (relating to notification of hazardous waste activities) and the applicable requirements of 40 CFR Part 264, Subparts A—D, I, J and DD and Chapter 264a, Subchapters A, B, D, I, J and DD, except for § 264a.18 (relating to location standards).

(iii) The applicable requirements of 40 CFR 262.34 (relating to accumulation).

(iv) Except for the characteristic of ignitability, the hazardous waste is not being rendered nonhazardous by means of dilution.

(v) A generator may mix waste oil with a waste which is hazardous solely because it exhibits the toxicity characteristic for benzene, arsenic, cadmium, chromium, lead or ignitability, provided that the resultant mixture does not exhibit any characteristic of hazardous waste under 40 CFR Part 261, Subpart C (relating to characteristics of hazardous waste) incorporated by reference in § 260a.1 (relating to incorporation by reference, purpose, scope and applicability) and that the mixture is managed in accordance with Chapter 298, Subchapter C (relating to waste oil generators).

(vi) Treatment activities subject to requirements in addition to those specified in this section are not eligible to operate under this permit-by-rule.

(3) The owner or operator of a battery manufacturing facility reclaiming spent, lead-acid batteries is deemed to have a permit-by-rule for treatment prior to the reclamation of the spent, lead-acid batteries, if the owner or operator complies with the following requirements:

(i) The notification requirements of 40 CFR 264.11.

(ii) The applicable requirements of 40 CFR Part 264, Subparts A—E, I—L and DD and Chapter 264a, Subchapters A, B, D, E, I—L and DD, except for § 264a.18.

(4) The owner or operator of a facility that reclaims hazardous waste onsite, at the site where it is generated is deemed to have a permit-by-rule for treatment prior to the reclamation, if the owner or operator complies with the following requirements:

(i) The notification requirements of 40 CFR 264.11.

(ii) The applicable requirements of Chapter 262a and Chapter 264a, Subchapters A, B, D, E, I, J and DD, except for § 264a.18, and 40 CFR Parts 262 and 264, Subparts A—E and I, J and DD.

(iii) For the purposes of this subsection, onsite reclamation includes reclamation of materials generated at other facilities operated or owned by the same generator, if the generator provides prior written notice to the Department and the wastes are shipped under a manifest in compliance with § 262a.20 (relating to general requirements) and 40 CFR Part 262.20 (relating to general requirements).

(iv) The Department may, under special circumstances, approve on a case-by-case basis the receipt and reclamation of wastes generated offsite by a different generator for reclamation at a facility regulated under this subsection without the reclamation of the wastes resulting in the loss of onsite reclamation status under this subsection.

(5) The owner or operator of a facility that treats recyclable materials to make the materials suitable for reclamation of economically significant amounts of the precious metals identified in 40 CFR Part 266, Subpart F (relating to recyclable materials utilized for precious metal recovery) is deemed to have a permit-by-rule if the owner or operator complies with the following:

(i) The notification requirements of 40 CFR 264.11 (relating to identification number).

(ii) The applicable requirements of Chapter 264a, Subchapters A, B, D, E, I, J and DD, except for § 264a.18, and 40 CFR Part 264, Subparts A—D, I, J and DD.

(c) In addition to the requirements incorporated by reference:

(1) With respect to any permit-by-rule facility under subsection (b)(3)—(6), the Department may, upon written application from a person subject to these paragraphs, grant a variance from one or more specific provision of those paragraphs in accordance with this subsection.

(2) In granting a variance, the Department may impose specific conditions reasonably necessary to assure that the subject activity results in a level of protection of the environment and public health equivalent to that which would have resulted from compliance with the suspended provisions. Any variance granted under this section will be at least as stringent as the requirements of section 3010 of the RCRA (42 U.S.C.A. § 6930) and regulations adopted thereunder.

#### **Authority**



The provisions of this § 270a.60 amended under sections 105, 402 and 501 of the Solid Waste Management Act (35 P. S. § § 6018.105, 6018.402 and 6018.501); sections 303 and 305(e)(2) of the Hazardous Sites Cleanup Act (35 P. S. § § 6020.303 and 6020.305(e)(2)); section 5, 402 and 501 of The Clean Streams Law (35 P. S. § § 691.5, 691.402 and 691.501); and section 1920-A of The Administrative Code of 1929 (71 P. S. § § 510-20).

#### **Source**

The provisions of this § 270a.60 amended June 1, 2001, effective June 2, 2001, 31 Pa.B. 2873; amended December 13, 2002, effective December 14, 2002, 32 Pa.B. 6102; amended January 9, 2009, effective January 10, 2009, 39 Pa.B. 201. Immediately preceding text appears at serial pages (294541) to (294544).

#### **Cross References**

This section cited in 25 Pa. Code § 264a.1 (relating to incorporation by reference, purpose, scope and reference); 25 Pa. Code § 265a.1 (relating to incorporation by reference, purpose, scope and applicability); 25 Pa. Code § 266a.70 (relating to applicability and requirements); 25 Pa. Code § 266a.80 (relating to applicability and requirements); and 25 Pa. Code § 270a.1 (relating to incorporation by reference, scope and applicability).

#### **§ 270a.62. Hazardous waste incinerator permits.**

Instead of the notification required by 40 CFR 124.10 (relating to public notice of permit actions and public comment period), the Department sends notice to all persons listed in § 270a.80 (d)(1) (relating to public notice and comment requirements).

#### **Source**

The provisions of this § 270a.62 amended December 13, 2002, effective December 14, 2002, 32 Pa.B. 6102. Immediately preceding text appears at serial page (280200).

#### **§ 270a.64. Interim permits for UIC wells.**

40 CFR 270.64 (relating to interim permits for UIC wells) is not incorporated by reference.

#### **§ 270a.66. Permits for boilers and industrial furnaces burning hazardous waste.**

Instead of the notification required by 40 CFR 124.10 (relating to public notice of permit actions and public comment period), the Department sends notice to all persons listed in § 270a.80(d)(1) (relating to public notice and comment requirements).

#### **Source**

The provisions of this § 270a.66 amended December 13, 2002, effective December 14, 2002, 32 Pa.B. 6102. Immediately preceding text appears at serial page (255051).

### \*Required Fields



EPA ID Number <u>PA0000193409</u>	Handler Name <u>Penn United Technologies, Inc.</u>
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## VIOLATIONS SECTION

(Additional Violations can be added/updated/deleted using the RCRAInfo CM&amp;E Additional Violations Form)

VIOLATION	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Update	<input type="checkbox"/> Delete	Link to Above Evaluation	<input checked="" type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	<u>262C</u>	<u>EPA</u>	<u>9/24/14</u>	<u>D</u> A RTC Qualifier is required if entering an Actual RTC Date.	<u>6/9/16</u>
Notes: <u>Failed to mark HW containers w/ start accumulation date</u>					

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	If Yes, fill in information below
Citation Type	Citation	Citation Type	Citation
<u>262C</u>	<u>40 CFR 262.34(a)(2)</u>		

VIOLATION	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Update	<input type="checkbox"/> Delete	Link to Above Evaluation	<input checked="" type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	<u>265I</u>	<u>EPA</u>	<u>9/24/14</u>	<u>D</u> A RTC Qualifier is required if entering an Actual RTC Date.	<u>6/9/16</u>
Notes: <u>Failed to conduct weekly inspections of HW accumulation area</u>					

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	If Yes, fill in information below
Citation Type	Citation	Citation Type	Citation
<u>265I</u>	<u>40 CFR 265.174</u>		

## HANDLER SECTION (Fill out if RCRA Non-Notifier)

Handler Name	Contact
Street	
City	State Zip Code
County	

## UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)

i. Indicate the Facility's current Universe(s):			
ii. Indicate the new RCRAInfo Generator Universe: Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.	LQG <input type="checkbox"/> Non-Handler <input type="checkbox"/>	SQG <input type="checkbox"/> Closed <input type="checkbox"/>	CEG <input type="checkbox"/>
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)	Transporter <input type="checkbox"/> If the transporter box is checked, you must check at least one mode of transportation below: <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.

\*Required Fields



## RCRAINFO CM&amp;E ADDITIONAL VIOLATIONS FORM

(Attach to RCRAInfo CM&amp;E Evaluation - Violation Form, if appropriate)

EPA ID Number <u>PA0000193409</u>		Handler Name <u>PennUnited Technologies, Inc.</u>	
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete			Link to Above Evaluation <input checked="" type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)
	<u>273B</u>	<u>EPA</u>	<u>9/24/14</u>
Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
<u>D</u> A RTC Qualifier is required if entering an Actual RTC Date.		<u>6/9/16</u>	
Notes: <u>Failed to store UV lamps in closed containers</u>			
LINK CITATIONS TO ABOVE VIOLATION?			<input checked="" type="checkbox"/> If Yes, fill in information below
Citation Type	Citation		
<u>273B</u>	<u>40 CFR 273.13(d)(1)</u>		
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete			Link to Above Evaluation <input checked="" type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)
	<u>273B</u>	<u>EPA</u>	<u>9/24/14</u>
Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
<u>D</u> A RTC Qualifier is required if entering an Actual RTC Date.		<u>6/9/16</u>	
Notes: <u>Failed to label containers storing UV lamps</u>			
LINK CITATIONS TO ABOVE VIOLATION?			<input checked="" type="checkbox"/> If Yes, fill in information below
Citation Type	Citation		
<u>273B</u>	<u>40 CFR 273.14(e)</u>		
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete			Link to Above Evaluation <input checked="" type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)
		<u>EPA</u>	<u>9/24/14</u>
Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
Notes:			
LINK CITATIONS TO ABOVE VIOLATION?			<input checked="" type="checkbox"/> If Yes, fill in information below
Citation Type	Citation		



Penn United - Missing Inspections  
HWAAs weekly

2013		2013	
January	February	March - 3/17/13 - 3/24/13	April
May	June	July	August
September	October - 10/6/13 - 10/13/13	November	December

\*dates based on "the week of"

Total: 4 weeks



Penn United - Missing Inspection  
HWAA weekly

2014		2014	
<p>January</p> <p>- 1/19/14</p> <p>- 1/26/14</p>	<p>February</p> <p>- 2/9/14</p> <p>- 2/16/14</p>	<p>March</p>	<p>April</p> <p>- 4/13/14</p> <p>- 4/20/14</p> <p>- 4/27/14</p>
<p>May</p> <p>- 5/4/14</p> <p>- 5/11/14</p> <p>- 5/18/14</p> <p>- 5/25/14</p>	<p>June</p> <p>- 6/1/14</p>	<p>July</p> <p>- 7/27/14</p>	<p>August</p> <p>- 8/10/15</p> <p>- 8/17/15</p> <p>- 8/24/15</p> <p>- 8/31/15</p>
<p>September</p> <p>- 9/7/15</p>	<p>October</p>	<p>November</p>	<p>December</p>

Total: 18 weeks



**Penn United Technologies Inc. Information Request- Reference No. C15-025**  
**March 9, 2016**

Wastes listed in response to Question 4.a. and those which utilize a satellite accumulation area at the time of the August 27, 2014 EPA Hazardous Waste Inspection are listed below. The time listed for how long appropriate wastes are kept in their satellite area will vary based upon product that is running through the plating facility. Further, these times are what we experienced in 2015. The engineer that oversaw this program left our employment in early 2015 so we are unable to approximate times for "at the time of the inspection". Added type of container and size for those stored in satellite areas.

<u>Hazardous Waste</u>	<u>Satellite Accumulation Area</u>	<u>Time in Satellite Area (days)</u>	<u>Type</u>	<u>Size</u>
Spent Aqueous Tin/ Lead Filters	YES	52	Cardboard Box	Cubic Yard
Spent Aqueous Nickel Filters	YES	52	Cardboard Box	Cubic Yard
Spent Palladium Filters	YES	60	Steel Drum	55 Gallon
Spent Plating Rinse Solution	NO	N/A	N/R	N/R
Spent Citric Acid Solution	NO	N/A	N/R	N/R
Spent Copper/ Nickel/ Tin/ Lead Coated Resin	NO	N/A	N/R	N/R
Gold Cyanide Solution	YES	7	Plastic Drum	55 Gallon
Silver Cyanide Solution	YES	30	Plastic Drum	55 Gallon
Evaporator Slurry Residue	YES	75	Poly Tank	1000 Gallon
Filter Press Cake	YES	35	Cardboard Box	Cubic Yard
Silver and Gold Filter Solids	YES	90	Plastic Drum	55 Gallon
Plating Trench Sludge	NO	N/A	N/R	N/R
Spent Black Oxide Waste	NO	N/A	N/R	N/R

N/A – Not Applicable

N/R – Not Requested

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#2  
V10

UV bulbs

- no container
- no label
- no date

- There is a small workshop at one end of Building #1. At the time of inspection, there were approximately 20 spent, 6 ft fluorescent light bulbs duct taped together and leaning against the wall in a corner. (See Photo # 5) The light bulbs were not in any type of container to prevent breakage, were not labeled, and did not have an accumulation start date.

90 day -

- Photo #6 shows the satellite accumulation area for spent filter cartridges located in Building #4 before they are moved to Building #1, and then eventually to the less than 90-day hazardous waste area in the basement of Building #6. *Where are these generated? SAA only @ POG. Was it dated?*

*SAA @ POG  
Where is this generated?*

In Building #4, gold and palladium filter cartridges (D003) from the electroplating line are recycled along a back wall within the room, see the yellow and red catchment sinks in Photo #8. A small closet type of room within Building #4, see Photo #7, is used as a satellite accumulation area for the gold and palladium material collected from the filters (F009). Just outside of the satellite accumulation room door were two (2) full, 55 gallon, blue, plastic drums containing gold and palladium cyanide stripper solution and solids that originated from the electroplating line. Mr. Berteotti stated that these drums were considered to be a second less than 90-day hazardous waste storage area that is separate from the basement of building #6. The drums were labeled, but did not have an accumulation start date, see picture #9).

*NO start date*

- In the basement of Building #6 is a less than 90-day hazardous waste accumulation area. At the time of inspection, there were (24 full), plastic (blue & black) 55 gallon drums (see photos #10 and #11. Five of the drums were labeled non-hazardous waste, while the remaining 19 drums were labeled having hazardous wastes as they contained spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) all coming from the electroplating process line. Of the 19 plastic drums labeled hazardous waste, 10 of the hazardous waste drums containing spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) did not have an accumulation start date. When asked if he knew how long the drums at been in the less than 90 day area, Mr. Berteolli said "he was not sure, but felt that they hadn't been there long".
- Approximately 20 feet from the less than 90-day hazardous waste area is a short wall about 3-foot high that separates the room. On the opposite side of this wall, this inspector noted a black, metal 55 gallon drum that was full of plating slurry (F006) from the electroplating line and labeled as a hazardous waste. The drum of plating slurry did not have a start accumulation date, see photo #12)
- About 15 feet away from the black, metal drum was an orange cardboard box that contained spent filter cake (D003). The filter cake is the remaining solids left over from the recycling of the precious metals involved in electroplating. This box was also on the opposite side of the partition wall from the designated less than 90-day hazardous waste



Building #3 is maintenance. Maintenance is housed in this one location, but services all operating areas of the facility and routine maintenance functions. Waste streams in this building include parts cleaning solutions (F006, D039), fluorescent light bulbs, and trash.

Building #4 houses the electroplating operations. Metal components either manufactured by Penn United or received from customers are electroplated with various metals including nickel, tin, tin-lead, gold, silver, or palladium. Waste streams in this building include electroplating rinse (D002, D008), electroplating sludge (F006), gold cyanide stripper solution and solids (D003, F009), and gold and palladium filter cartridges (D003). Metal and non-precious metal filters are recycled or used as an ingredient.

#5?

Building #6 houses the tool and die manufacturing and precision assembly processes. Tool and die components are manufactured from various steel products by machining and grinding processes. Precision assembly consists of various manufactured electronic components and tools which are assembled by either hand or machine. Waste streams from this building includes, waste coolants and trash.

Following are the findings from the inspection:

#### Facility Observations:

- The tool and die manufacturing process in building #1 is done on three long, parallel, production lines. There used to be four production lines until line #3 was completely removed a few years ago. The waste lubricating oils, waste coolants (F001) and waste alcohol coming from these production lines are collected in 55-gallon drums and store in a central location (see photo # 1). After the plastic 55-gallon drums are full, they are relocated approximately 30 yards away to where the removed production line #3 once stood. (See photos # 2, 3, and 4).
- At the time of inspection, there were 12 full, 55-gallon plastic drums containing waste solvents and coolants (F001), as well as, two large, full, cardboard boxes containing spent filter cartridges (D003) in this secondary area. When asked how long the drums and boxes remain in the area, Mr. Berteotti stated that the 55-gallon drums and cardboard boxes usually stay in this secondary storage area for "a month or so" before being relocated to a third area known as the less than 90-day storage area located in the basement of Building #6. At the time of inspection, nine (9) 55-gallon drums containing spent coolant and alcohol (F001) from the machining and grinding operation were labeled as hazardous waste, three (3) 55-gallon drums containing waste oils were labeled as non-hazardous waste, and the two (2) large cardboard boxes containing spent cyanide filter cartridges (D003) were labeled as hazardous waste. None of the containers had an accumulation start date at the time of the inspection.

SAA



No date

90 day  
(1 month)



another  
90 day

did these  
have  
start  
accumulation  
dates

11 containers

VIO  
① #

Failure  
to date  
HWaccum

No  
longer  
SAA

Only 55ga  
can be  
considered  
SAA

③

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area. The box was labeled as a hazardous waste, and was dated at the time of inspection. (See photo #13)

What was the delay?

In Building #1, the area is designated as the Universal Waste accumulation area. At the time of inspection, there were two large wooden boxes (3ft x 6ft) full of spent light bulbs, as well as, several open and taped closed boxes of spent light bulbs. The total number of bulbs is estimated to be 200. When asked how long the bulbs have been there, Mr. Berteolli stated he was not sure because the Facility has no tracking system in place to quantify the amount of bulbs or the length of time they have accumulated. Mr. Berteolli stated that he is not sure of how long they have been there, but it has been at least several months. None of the boxes of spent light bulbs were labeled or contained an accumulation start date.

#### Records review:

The EPA inspector reviewed the Facility's past two Biennial Reports, three years of manifests, the facility Preparedness Prevention Control (PPC) Plan, employee training records, hazardous waste weekly inspection records, and Emergency Procedures and Response Plan.

After a thorough review of the afore mentioned records, this inspector found problems associated only with the less than 90 day hazardous waste storage area weekly inspections. The other records reviewed showed no problems.

This EPA inspector noticed 7 discrepancies when reviewing the less than 90- day hazardous waste area weekly inspection sheets. The dates below show inspection dates and the length of time between certain dates.

Date Range	Days between inspection
3/12/13 - 4/3/13	22 days
10/3/13 - 10/23/13	19 days
1/14/14 - 2/4/14	20 days
2/4/14 - 2/26/14	21 days
4/8/14 - 6/11/14	32 days
7/22/14 - 8/8/14	16 days
8/8/14 - 9/15/14	36 days

#3 failure to do wklly inspections

→ Knowledge of SAA vio's b/c of state documented violation

Ask State about 2012 violation 265.192(a)

5



- All photographs were taken by this inspector using a Nikon Coolpix P4 camera.

#### Inspection Photo Log



*Photo 1 - Designated satellite accumulation area - tool and die manufacturing.*



*Photo 2 - Spent solvents and waste oils moved from designated SAA area to this location*

## Background

✓ The EPA Region III's Office of Enforcement Compliance and Environmental Justice (OECEJ) in Philadelphia, PA received a request from EPA Region III's Land & Chemicals Division to conduct a RCRA C Compliance Inspection at Penn United Technologies Inc. (the Facility) located in Cabot, Pennsylvania. The inspection was assigned to Robert Staves (the EPA inspector). Included with the request was information which indicated that the Facility is a Large Quantity Generator of hazardous waste. Prior to conducting the inspection, the EPA inspector did contact PADEP to notify them of the upcoming inspection. An e-mail was sent to Renee Bartholomew, Chief of the Enforcement & Information Section. Ms. Bartholomew forwarded the e-mail to the appropriate PADEP regional office. The Facility was not notified prior to the inspection.

The Facility is an integrated business that includes tool and die manufacturing and repair, metal stamping, precision assembly, and electroplating. The Facility is comprised of seven buildings that total about 550,000 sq. ft under roof.

## Inspection

The EPA inspector arrived at the Facility at approximately 9:00 am. Upon entering the Facility's reception area, this inspector presented his credentials to the receptionist and requested to speak with the environmental coordinator. A few minutes later, the EPA inspector was greeted by Mr. Berteotti. The EPA inspector presented his credentials to the Facility representative identifying him as an authorized representative of the Agency. The EPA inspector provided the Facility representative with a brief description of the purpose and scope of the subject inspection. The EPA inspector next asked the Facility personnel to provide a description of the Facility and its activities including the types of waste generated at the Facility and how the waste is managed on site. Mr. Berteotti explained the various Facility areas, the manufacturing processes, storage areas, and waste streams.

Building #1 houses the tool & die manufacturing process, as well as, the stamping process. The tool and die components are manufactured from various steel products by machining and grinding operations. The stamping process forms metal into numerous components of varying size and shape with power presses. Waste streams in this building include lubricating oils, waste oil, alcohol, coolant, spent coolant, and trash.

Building #2 houses a stamping process, second operations, and warehousing. The stamping process again is various metal components pressed by machines into various sizes and shapes. Second operations refers to metal components used in the medical industry. The components are cleaned and packaged for shipment to customers that assemble medical devices. The warehousing area is an area that stores materials that are used throughout the different manufacturing locations. Waste streams in this building include trichloroethylene (F001), oily waste water, waste lubricating oil, and trash.



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Resource Conservation and Recovery Act  
Subtitle C, Compliance Evaluation

Penn United Technologies Inc.  
799 North Pike Road  
Cabot, Pennsylvania 16023

RCRA I.D. No: PA0000193409

Date of Inspection: August 27, 2014

EPA Representative:

Robert Staves  
Environmental Protection Specialist  
(215) 814-2962  
staves.robert@epa.gov

Facility Representative:

Steve Berteotti  
Environmental, Health & Safety Manager  
(724) 352-1507 x.4610  
steve\_berteotti@pennunited.com

1

Key Factors in 'Penn United' Case

B1 B1

1. Possible (most likely) storage for greater than 90 days. Takes from SAA to "secondary area" on production floor. Had 11 undated HW containers in this area. Facility rep said there for "one month or so" before being moved to designated HWAA in B6.  
--obtain manifests. Could be sending out every 90 days and still storing for greater than 90 days.
2. 22 out of 31 HW drums not dated
3. Failure to close, date, label universal waste containers (~200 bulbs)
4. SAA possibly (most likely) not at point of generation. In closet of B4, once full moved to B1 ("secondary area"), then to B6 90-day HWAA
5. Failure to conduct weekly hazardous waste inspections – possibly obtain copies of these inspection records. Inspector didn't get, just wrote down dates.

-double check photo #'s match up  
-Sit & talk w/ R. Staves (Building #2)  
Rob. IRL request  
-Prepare for IRL.  
• Building #2 waste. Please describe how tool waste is generated and managed. Give detailed process on how much & how often waste is generated  
Where is the waste stored after generation? Please include any satellite accumulation containers the description  
In detail, describe process, time from generation to shipment  
waste man encounter.



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Rec'd 7/23

**ENFORCEMENT CONFIDENTIAL**

**• UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Facility Inspection Program**

**1650 Arch Street**

**Philadelphia, PA 19103**

**(215) 814-2962**

Date: July 15, 2015

From: Robert Staves  
EPA Inspector

To: Samantha Beers  
Director, OECEJ

Re: Penn United Technologies Inc.  
799 North Pike Road  
Cabot, Pennsylvania 16023

RCRA Number: PA0000193409

... why does RCRA info say 9/24/14??

Based on the inspection conducted on August 27, 2014, the following areas of concern were noted:

- At the time of inspection, there were 12 full, 55-gallon plastic drums containing waste solvents and coolants (F001), and two large, full, cardboard boxes containing spent filter cartridges (D003) in a secondary area approximately 30 yards away from the designated satellite accumulation and collection area.
- None of the containers in the secondary area mentioned above had an accumulation start date at the time of the inspection.
- There is a small workshop at one end of Building #1. At the time of inspection, there were approximately 20 spent, 6-ft fluorescent light bulbs duct taped together and leaning against the wall in a corner. The light bulbs were not in any type of container to prevent breakage, were not labeled, and did not have an accumulation start date.

When can you get a CO. for greater than 90 day storage?

- In Building #4, gold and palladium filter cartridges (D003) from the electroplating line are stored, to be recycled, along a back wall within the room. A small closet type room within Building #4 is used as a satellite accumulation area for the gold and palladium material collected from the filters (F009). Just outside of the satellite accumulation room door were two (2) full, 55-gallon, blue, plastic drums containing gold and palladium cyanide stripper solution and solids that originated from the electroplating line. Mr. Berteotti stated that these drums were considered to be a second less than 90-day hazardous waste storage area that is separate from the basement of building #6. The drums were labeled, but did not have an accumulation start date.

None of their drums (HAW) have start dates!?

- In the basement of Building #6 is a less than 90-day hazardous waste accumulation area. At the time of inspection, there were 24 full, plastic (blue & black) 55-gallon drums. Five of the drums were labeled non-hazardous waste, while the remaining 19 drums were labeled having hazardous wastes as they contained spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) all coming from the electroplating process line. Of the 19 plastic drums labeled hazardous waste, 10 of the hazardous waste drums containing spent sulfuric acid, spent hydrochloric acid, and spent cyanide (F006) did not have an accumulation start date.

- Approximately 20 feet from the only designated less than 90-day hazardous waste area is a short wall about 3-foot high that separates the room. On the opposite side of this wall, this inspector noted a black, metal 55-gallon drum that was full of plating slurry (F006) from the electroplating line and labeled as a hazardous waste. This drum was not in the designated less than 90-day area.

? And? labeled? dated? No.

- The drum of plating slurry mentioned above did not have a start accumulation date.

- About 15 feet away from the black, metal drum was an orange cardboard box containing spent filter cake (D003). This box of hazardous waste was not in the designated less than 90-day storage area. ? Not a violation

- In Building #1, there is a room designated as the Universal Waste accumulation area. At the time of inspection, there were two large wooden boxes (3ft x 6ft) full of spent light bulbs and several open and taped closed boxes of spent light bulbs. The total number of bulbs was estimated to be 200. When asked how long the bulbs have been there, Mr. Berteolli stated he was not sure because the Facility has no tracking system in place to quantify the amount of bulbs or the length of time they have accumulated. Mr. Berteolli stated that he is not sure of how long they have been there, but it has been at least several



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months. None of the boxes of spent light bulbs were labeled or contained an accumulation start date.

- This EPA inspector noticed 7 discrepancies when reviewing the less than 90-day hazardous waste area weekly inspection sheets. The dates below show inspection dates and the length of time between certain dates. The days between inspections exceeds the weekly inspection requirement.

BLE designated AHAA

Date Range	Days between inspection
3/12/13 – 4/3/13	22 days
10/3/13 – 10/23/13	19 days
1/14/14 – 2/4/14	20 days
2/4/14 – 2/26/14	21 days
4/8/14 – 6/11/14	32 days
7/22/14 – 8/8/14	16 days
8/8/14 – 9/15/14	36 days

Failure to conduct weekly inspections

IRL? SAA in "closet"

- where is F009 waste generated? SAA away from
- inspection records. Main
- manifests! How often are they shipping? POG?

→ was Facility asked how long un-dated drums were there @ time of inspection??

- 9-55gal. (no dates)
- 2- >55gal. (no dates)
- ~~1~~ 9-55gal. (10 did not have date)
- 1- >55gal. (no dates)

operation as SAA  
when really 90 day HWAA

(Knowledge of 90 day HWAA)

90 day HWAA  
↳ basement of Building #6

31 55gal. (a couple over that)

① Storage greater than 90 days!?  
SAA → another "area" → 90 HWAA  
not dated  
11 containers  
~ 1 month Cor 800  
2° area

② Failure to date HW containers  
drums 28/31 counts documented out of 31.

- ③ Failure to contain UN
  - ④ Failure to date UN
  - ⑤ Failure to label UN
- } multiple counts

⑥ B4 → B1 → B6  
"eventually"  
no longer SAA  
not @ POG

⑦ Failure to conduct w/ly HWAA inspections

HUGE container  
only 55gal.  
of this considered SA.

⑧